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Attorneys for APG Financial, Inc.

IN THE UNITED STATES BANKRUPTCY COURT
DISTRICT OF UTAH, CENTRAL DIVISION

In re:

Travis W. Green,
Debtor,
and
Christina Gibson-Green,
Joint Debtor.

Chapter 13
Case No. 14-32955
Judge Joel T. Marker

**NOTICE OF MOTION AND NOTICE OF OPPORTUNITY FOR HEARING ON
MOTION OF APG FINANCIAL, INC. FOR RELIEF FROM AUTOMATIC STAY**

(Objection Deadline: January 22, 2014)

PLEASE TAKE NOTICE that APG Financial, Inc. (“APG”), pursuant to 11 U.S.C. § 362 and Rule 4001 of the Federal Rules of Bankruptcy Procedure and Local Rule 4001-1, has filed its Motion for Relief From Automatic Stay (the “Motion”). A copy of the Motion accompanies this Notice.

YOUR RIGHTS MAY BE AFFECTED. You should read these papers carefully and discuss them with your attorney, if you have one in the bankruptcy case. If you do not have an attorney, you may wish to consult one.

The Motion provides that APG will be given relief from the automatic stay in order to pursue its rights against a 2008 Dodge Avenger (VIN # 1B3LC56R08N683146) (the "Vehicle").

NO HEARING WILL BE CONDUCTED ON THIS MOTION UNLESS A WRITTEN OBJECTION IS FILED WITH THE CLERK OF THE COURT ON OR BEFORE THE OBJECTION DEADLINE SET FORTH BELOW.

If you do not want the Court to grant the relief requested in the Motion then:

(1) on or before **January 22, 2014**, you or your lawyer must file with the Bankruptcy Court a written objection to the Motion explaining your position at:

United States Bankruptcy Court
350 South Main Street, Room 301
Salt Lake City, UT 84101

If you mail your objection to the Bankruptcy Court for filing you must mail it early enough so that the Court will **receive** it on or before January 22, 2014. You must also mail a copy of your objection to counsel for APG at the following address:

Parr Brown Gee & Loveless
Chad S. Pehrson
201 South 700 East, Suite 700
Salt Lake City, Utah 84111

(2) if an objection is filed, the Court will hold a hearing on the Motion, and the Court has made available the following time for the hearing: January 28, 2015 at 9:00 a.m. in Courtroom 341, United States Bankruptcy Court, 350 South Main Street, Salt Lake City, Utah 84101. **There will be no further notice of the hearing** and failure to attend the hearing will be deemed a waiver of your objection.

If you or your attorney do not take these steps, the Bankruptcy Court may decide that you do not oppose the relief sought in the Motion and may enter an order granting that relief requested in the Motion. In the absence of a timely filed objection, the undersigned counsel may and will ask the Court to strike the hearing and enter an order approving the Motion without a hearing.

DATED this 5th day of January 2015.

PARR BROWN GEE & LOVELESS

/s/ Chad S. Pehrson
Chad S. Pehrson
Attorneys for APG Financial, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was served this 5th day of January 2015, by the Court's CM/ECF electronic transmission or by United States mail on the following:

Sarah L. Matthews (CM/ECF)

Kevin R. Anderson, trustee (CM/ECF)

United States Trustee (CM/ECF)

Travis W. Green (US MAIL)
5040 Niagra Cir.
Salt Lake City, UT 84118

Christina Gibson-Green (US MAIL)
5040 Niagra Cir.
Salt Lake City, UT 84118

America First Credit Union (US MAIL)
P.O. Box 9199
Attn: Collections
Ogden, UT 84409-9983

Bonneville Billing and Collections (US MAIL)
America First Credit Union
P.O. Box 150621
Ogden, UT 84415-0621

Amsurg SLC Anesthesia (US MAIL)
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Goodlettsville, TN 37070

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Dr. Louis Mizell, MD (US MAIL)
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Dr. Carmela Javellana, MD (US MAIL)
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Enhanced Recovery Services (US MAIL)
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EOS CCA (US MAIL)
700 Longwater Drive J
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EOS CCA (US MAIL)
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EPN, Inc (E Partner Net) (US MAIL)
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Granger Medical (US MAIL)
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West Valley City, UT 84170-0658

Outsource Receivable (US MAIL)
P.O. Box 166
Ogden, UT 84402-0166

Outsource Receivable (US MAIL)
372 24th Street Suite 300
Ogden, UT 84401-1438

Jordan Valley Medical Center (US MAIL)
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West Jordan, UT 84088

Mountain Land Collections (US MAIL)
PO Box 1280
Jordan Valley Medical Center
American Fork, UT 84003

Knight Adjustment Bureau (US MAIL)
404 East 4500 South
Suite A-34
Salt Lake City, UT 84107-2710

Mountain Land Collections (US MAIL)
PO Box 1280 J
American Fork, UT 84003

Questar Gas Company (US MAIL)
Attn: Bankruptcy DNR 244 J
P.O. Box 3194
Salt Lake City, UT 84110-3194

Rocky Mountain Power (US MAIL)
PO Box 25308
Salt Lake City, UT 84125-0308

SST (Systems & Svcs Technologies, Inc) (US
MAIL)
4315 Pickett Road
PO Box 3999
Saint Joseph, MO 64503-0999

/s/ Chad S. Pehrson